

**FREEDOM COURT REPORTING**

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<p>1 Q. What time period?</p> <p>2 A. Wait a minute. It's a year,</p> <p>3 year and a half, 18 months.</p> <p>4 Q. What time period,</p> <p>5 approximately?</p> <p>6 A. From April of '95 up until</p> <p>7 March of '96.</p> <p>8 Q. That was where?</p> <p>9 A. C Con. It was in</p> <p>10 Huntsville.</p> <p>11 Q. Huntsville. Prior to that,</p> <p>12 where were you employed?</p> <p>13 A. I wasn't employed.</p> <p>14 Q. You were going to school?</p> <p>15 A. Yes. Well, just had a</p> <p>16 baby.</p> <p>17 Q. Have you been terminated</p> <p>18 from any position?</p> <p>19 A. No.</p> <p>20 Q. Any warnings or disciplinary</p> <p>21 actions?</p> <p>22 A. No.</p> <p>23 Q. Prior to the charge that you</p>	<p>1 A. Shelton Hamilton, Brook; I</p> <p>2 don't recall her last name.</p> <p>3 Q. Anyone else?</p> <p>4 A. No.</p> <p>5 Q. Who offered you the</p> <p>6 position?</p> <p>7 A. They did.</p> <p>8 Q. Both?</p> <p>9 A. Yes.</p> <p>10 Q. And what was the position</p> <p>11 when you first started?</p> <p>12 A. Customer service rep.</p> <p>13 Q. And have you remained in</p> <p>14 that position since you've been at EDS</p> <p>15 or that title?</p> <p>16 A. That title, yes.</p> <p>17 Q. When you first started, what</p> <p>18 area were you in?</p> <p>19 A. On the phone.</p> <p>20 Q. So you were what I</p> <p>21 would call --</p> <p>22 A. Customer service, yes.</p> <p>23 Q. -- call center?</p>
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<p>1 filed in this case, have you filed a</p> <p>2 charge of discrimination before?</p> <p>3 A. No.</p> <p>4 Q. You said you started in</p> <p>5 August of 1997 with EDS?</p> <p>6 A. Uh-huh (affirmative</p> <p>7 response). Yes.</p> <p>8 Q. How did you find out about</p> <p>9 the position?</p> <p>10 A. A friend of mine that</p> <p>11 attended church with me.</p> <p>12 Q. Who is that?</p> <p>13 A. Shonda Robinson.</p> <p>14 Q. Was she employed by EDS?</p> <p>15 A. Yes.</p> <p>16 Q. She currently employed by</p> <p>17 EDS?</p> <p>18 A. No.</p> <p>19 Q. Did you have to interview</p> <p>20 for the position?</p> <p>21 A. Yes.</p> <p>22 Q. Who did you interview</p> <p>23 with?</p>	<p>1 A. Yes.</p> <p>2 Q. Could you tell me a little</p> <p>3 bit about what EDS does at the</p> <p>4 Montgomery facility?</p> <p>5 A. This -- this particular</p> <p>6 contract we consolidate student loans.</p> <p>7 Q. And is that what it did back</p> <p>8 in '97?</p> <p>9 A. Yes.</p> <p>10 Q. And so when you started, you</p> <p>11 were on the phones talking --</p> <p>12 A. Correct.</p> <p>13 Q. -- customer service?</p> <p>14 A. Yes, ma'am.</p> <p>15 Q. How long did you do that?</p> <p>16 A. Four months.</p> <p>17 Q. Who did you report to?</p> <p>18 A. Robert Martin.</p> <p>19 Q. Could you spell his last</p> <p>20 name?</p> <p>21 A. M-A-R-T-I-N.</p> <p>22 Q. After four months, what did</p> <p>23 you do?</p>

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<p style="text-align: right;">Page 61</p> <p>1 in management?</p> <p>2 A. Open door policy, anybody.</p> <p>3 And Brenda Cheatham, if I'm not</p> <p>4 mistaken, she's also -- she has the</p> <p>5 title of team lead.</p> <p>6 Q. Besides that one incident</p> <p>7 prior to February of 2005, have</p> <p>8 Mr. Williams said anything that you</p> <p>9 consider to be offensive in nature to</p> <p>10 you?</p> <p>11 A. No.</p> <p>12 Q. Had he ever touched you</p> <p>13 prior to the February 2005 incident?</p> <p>14 A. No.</p> <p>15 Q. And you said -- what was the</p> <p>16 conversation with Ms. Cheatham when you</p> <p>17 told her what had happened?</p> <p>18 A. I came to her desk and I was</p> <p>19 like something just -- weird just</p> <p>20 happened. And she was like what. I</p> <p>21 said Jeff made a statement to me in the</p> <p>22 breakroom and she was like what was it</p> <p>23 and that's when I told her.</p>	<p style="text-align: right;">Page 63</p> <p>1 like, oh, it's cold outside. And he was</p> <p>2 like, oh, I need you to warm me up.</p> <p>3 Then he put his hands down my pants. He</p> <p>4 put his -- excuse me. I'm sorry. He</p> <p>5 placed his hands down by pants and he</p> <p>6 grabbed my shirt out and he was rubbing</p> <p>7 on my body. And I was pushing him, get</p> <p>8 -- get off me, get -- get off me. And</p> <p>9 he start rubbing on my stomach and he</p> <p>10 moved up to my breast area and -- excuse</p> <p>11 me. Somebody have some tissue, please?</p> <p>12 I'm sorry.</p> <p>13</p> <p>14 (Mr. Walker handed the witness a</p> <p>15 box of Kleenex.)</p> <p>16</p> <p>17 A. Thanks. We -- he grabbed</p> <p>18 my -- and I kept pushing him off of me.</p> <p>19 And he said you feel good. He layed his</p> <p>20 hands -- head on my shoulder. And I</p> <p>21 just kept pushing and then the elevator</p> <p>22 door opened up and he said I just had a</p> <p>23 nice lunch and I looked at him. I said</p>
<p style="text-align: right;">Page 62</p> <p>1 Q. And what was her response?</p> <p>2 A. She was like, oh, you know,</p> <p>3 just shrug it off. I'm like oh. If he</p> <p>4 say anything else to you, just basically</p> <p>5 let me know.</p> <p>6 Q. All right. Let's talk about</p> <p>7 Mr. Williams, what you claim happened in</p> <p>8 February of 2005. Could you tell me</p> <p>9 what happened?</p> <p>10 A. Okay. I was coming back</p> <p>11 from lunch and he was coming back from</p> <p>12 lunch as well. We walked into the</p> <p>13 ground floor where the elevators are and</p> <p>14 I felt something brush against my -- my</p> <p>15 behind. And I thought he just walked in</p> <p>16 too close to me. The elevator door</p> <p>17 opened. I stepped on first. He came in</p> <p>18 from behind -- came in behind me. I</p> <p>19 turned around. I hit the sixth floor</p> <p>20 button. As soon as the door closed,</p> <p>21 he -- he immediately grabbed me 'cause</p> <p>22 it was cold that February, that</p> <p>23 particular, he grabbed me. And he was</p>	<p style="text-align: right;">Page 64</p> <p>1 where did you go. He was like I had to</p> <p>2 take some jeans by back to I think it</p> <p>3 was Looking Good or Weil's. And I</p> <p>4 walked to my desk and my coworker, she</p> <p>5 looked at me, and she asked me what was</p> <p>6 wrong. And I -- and I walked to the</p> <p>7 breakroom and I told her. And she told</p> <p>8 me to report it immediately. Can I --</p> <p>9 can I step outside, please?</p> <p>10 MS. JACOBS: Sure. Can take</p> <p>11 a break.</p> <p>12 MS. VIDEOGRAPHER: Off the</p> <p>13 record. The time is 10:46.</p> <p>14</p> <p>15 (A brief recess was taken.)</p> <p>16</p> <p>17 MS. VIDEOGRAPHER: Back on</p> <p>18 the record. We commence Tape 2. The</p> <p>19 time is 10:53.</p> <p>20 Q. (By Ms. Jacobs) Ms. Jacobs,</p> <p>21 we were talking about the incident that</p> <p>22 occurred in February of 2005. And if</p> <p>23 I'm correct, it was February 10th, does</p>

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<p style="text-align: right;">Page 85</p> <p>1 about having sex with men in front of  2 your coworkers --  3 A. No.  4 Q. -- or with your coworkers?  5 A. No.  6 Q. Or talked about men's body  7 parts in front of your coworkers?  8 A. No.  9 Q. How good somebody looks, how  10 much you'd like to have sex with  11 somebody even implying it?  12 A. Implying it, I can't go off  13 what someone else's implied or what  14 their thought process, no, I can't.  15 Q. But you never meant to imply  16 it?  17 A. I've never implied it.  18 Q. Now, Ms. Relf in addition to  19 talking to Mr. Williams' supervisor  20 reported it to human resources or the  21 employee relations department;  22 correct?  23 A. I don't know.</p>	<p style="text-align: right;">Page 87</p> <p>1 informed me that she wanted me to put it  2 in writing. I put it in writing and she  3 stated she was going to get back with me  4 in a couple weeks, which she never  5 done.  6 Q. Who told you to contact  7 Leslie?  8 A. I'm not sure was it Tara or  9 Brenda. But I want to say Brenda but  10 I'm not sure because she told me I need  11 to escalate it.  12 Q. How did you know to contact  13 Leslie?  14 A. Info center, looked it up.  15 Q. Her name's on the info  16 center?  17 A. Well, I think it's -- it's  18 human resource, her name is on it,  19 yes.  20 Q. Had you ever spoken to her  21 before?  22 A. Prior to this?  23 Q. Uh-huh (affirmative</p>
<p style="text-align: right;">Page 86</p> <p>1 Q. Well, at some point in time,  2 you were advised that an investigation  3 was taking place and asked to write a  4 statement, weren't you?  5 A. I contacted human  6 resource.  7 Q. Who did you contact?  8 A. Leslie Liebman.  9 Q. When did you contact  10 Leslie?  11 A. I think it was that day, a  12 couple days later.  13 Q. How did you contact her?  14 A. Via e-mail.  15 Q. What'd she say?  16 A. I e-mailed her and she  17 e-mailed me back.  18 Q. Okay. What was the e-mail  19 correspondence about?  20 A. Basically, I was telling her  21 about the incident. I was told to get  22 in touch with her and I told her about  23 the incident in the elevator. Then she</p>	<p style="text-align: right;">Page 88</p> <p>1 response).  2 A. No.  3 Q. And you said that she asked  4 you to write a statement?  5 A. Yes.  6  7 (Defendants' Exhibit No. 6 was  8 marked for identification.)  9  10 Q. You've been handed Exhibit  11 No. 6. Do you recognize this  12 document?  13 A. Yes.  14 Q. Is this the statement you  15 wrote?  16 A. Yes.  17 Q. So you actually sat down and  18 typed this statement?  19 A. Yes.  20 Q. Did you do that at work or  21 at home?  22 A. At work.  23 Q. Okay. And it's dated</p>

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<p>1 A. Yes.</p> <p>2 Q. It was just you on the</p> <p>3 elevator with Mr. Williams?</p> <p>4 A. Right.</p> <p>5 Q. No one saw what happened?</p> <p>6 A. Right.</p> <p>7 Q. Okay. And so you told her</p> <p>8 you were seeing a therapist and she said</p> <p>9 that was good?</p> <p>10 A. Yes.</p> <p>11 Q. And that EDS would pay for a</p> <p>12 certain number of visits?</p> <p>13 A. She said EDS has things in</p> <p>14 place for that.</p> <p>15 Q. Okay.</p> <p>16 A. Basically.</p> <p>17 Q. Did you discuss with her</p> <p>18 about what those things were?</p> <p>19 A. No.</p> <p>20 Q. Okay. Did you ever look</p> <p>21 into what those things were?</p> <p>22 A. Yes.</p> <p>23 Q. And what types of things</p>	<p>1 billing went. I'm -- I'm not too clear</p> <p>2 on that one.</p> <p>3 Q. Okay.</p> <p>4 A. But I know I paid most of</p> <p>5 the bill.</p> <p>6 Q. Right. So there's medical</p> <p>7 insurance and then for some of the</p> <p>8 visits EDS would have paid you back for</p> <p>9 the copay?</p> <p>10 A. No, they didn't pay me back</p> <p>11 for the copay. They was --</p> <p>12 Q. Then what did they pay</p> <p>13 for?</p> <p>14 A. I'm -- I'm not sure what</p> <p>15 they paid for, but they paid for I think</p> <p>16 six visits, copays.</p> <p>17 Q. Who were those visits to?</p> <p>18 A. Vonceil Smith.</p> <p>19 Q. Who is that?</p> <p>20 A. A psychiatrist.</p> <p>21 Q. How'd you find Dr. Smith?</p> <p>22 A. From a book.</p> <p>23 Q. Had you ever been to Dr.</p>
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<p>1 does EDS have in place?</p> <p>2 A. They -- I think they pay for</p> <p>3 like six visits and you pay for the</p> <p>4 rest.</p> <p>5 Q. And did you have EDS pay for</p> <p>6 the first six visits?</p> <p>7 A. I think I paid for the</p> <p>8 initial first two, and then she was</p> <p>9 like, no, just go ahead and let them do</p> <p>10 it. Tara was like, you know, she was</p> <p>11 looking into the paperwork for me to do</p> <p>12 it.</p> <p>13 Q. Okay. And did that</p> <p>14 happen?</p> <p>15 A. Yes.</p> <p>16 Q. So EDS paid for a certain</p> <p>17 number of visits?</p> <p>18 A. Yes. My insurance paid for</p> <p>19 it and they paid for the copay.</p> <p>20 Q. Okay. So your medical</p> <p>21 insurance paid for the visits and</p> <p>22 then --</p> <p>23 A. I'm not really sure how the</p>	<p>1 Smith before?</p> <p>2 A. No.</p> <p>3 Q. Nobody recommended Dr.</p> <p>4 Smith?</p> <p>5 A. No.</p> <p>6 Q. How long did you see Dr.</p> <p>7 Smith?</p> <p>8 A. From March until like</p> <p>9 November '05.</p> <p>10 Q. How often did you see Dr.</p> <p>11 Smith?</p> <p>12 A. Initially once a week, then</p> <p>13 she went to twice a month, then back to</p> <p>14 once every week.</p> <p>15 Q. And you stopped seeing her</p> <p>16 in November of '05?</p> <p>17 A. Yes.</p> <p>18 Q. Why?</p> <p>19 A. Couldn't afford it</p> <p>20 anymore.</p> <p>21 Q. Insurance stopped paying for</p> <p>22 it?</p> <p>23 A. Oh, insurance been -- been</p>

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<p style="text-align: right;">Page 101</p> <p>1 stop paying for it. 2 Q. Do you know what, if 3 anything, happened to Mr. Williams if he 4 was disciplined in any way, counseled in 5 any way? 6 A. I don't know. I got -- 7 didn't get a -- I just had no dealings 8 with what was going on with him. I was 9 trying to deal with me. 10 Q. After February of 2005, did 11 Mr. Williams ever touch you again? 12 A. No. 13 Q. So he's never tried to 14 attack you, touch you, hug you, anything 15 since February of 2005? 16 A. Intimidate. 17 Q. I'm not asking about 18 intimidate. I'm asking has he ever 19 touched you? 20 A. No. 21 Q. Okay. Has he ever spoken to 22 you? 23 A. No.</p>	<p style="text-align: right;">Page 103</p> <p>1 A. I was sitting at my desk, 2 and where I sit, I sit like right in 3 front of the door when people walk in 4 and out. And every time somebody walk 5 pass, we have a habit, we all would look 6 and see who's passing by. And everybody 7 was gone to lunch and I was the only one 8 sitting back there. And like I said, 9 didn't know who it was but if somebody 10 walked pass me immediately just look up. 11 And when I looked up, he looked at me 12 and he rolled his eyes at me and I just 13 slumped back down in my chair. 14 Q. He works for EDS still? 15 A. Yes. 16 Q. And he works on the same 17 floor as you? 18 A. Yes. 19 Q. So periodically you're going 20 to have to see him; correct? 21 A. Well, not -- well, I didn't 22 have to see him 'cause there's two 23 sides.</p>
<p style="text-align: right;">Page 102</p> <p>1 Q. So he hasn't spoken to you 2 or touched you but he's intimidated 3 you? 4 A. Yes. 5 Q. How? 6 A. He was walking back and 7 forth through my area like 20, 25 times 8 a day. He'll stop at the water fountain 9 right in front of my desk and stare at 10 me. He'll stop -- and at the time, 11 Annie Kent was sitting right in my area. 12 He'd stand there and look back at me and 13 stare at me and just roll his eyes at 14 me. 15 Q. Anybody else see this? 16 A. When I see him, I slump 17 down. Tara saw a lot of it. 18 Q. How often did this occur? 19 A. Oh, quite often. Up until 20 yesterday, actually. 21 Q. Yesterday it occurred? 22 A. Yes. 23 Q. What happened yesterday?</p>	<p style="text-align: right;">Page 104</p> <p>1 Q. Okay. But it -- your -- 2 from what I understand, you've got 3 cubicles. And if he walks pass and you 4 pop up, you're going to see him? 5 A. He was -- 6 Q. I'm not asking about 7 yesterday. I'm just asking in general. 8 A. I'm saying in general I 9 don't have to see him because like I 10 stated to Jarvis at the time, there's a 11 restroom on the other side of the 12 building. 13 Q. Okay. 14 A. A men's restroom. There's 15 an entrance to the breakroom on the 16 other side that he can go but he comes 17 by that area. 18 Q. Is it shorter to go by your 19 office? 20 A. It's the same amount of 21 distance. 22 Q. Okay. You say he goes by 23 and stands by Annie Kent's desk?</p>

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<p style="text-align: right;">Page 105</p> <p>1 A. At the time. Annie Kent's 2 no longer on the team. 3 Q. So when did that happen? 4 A. That -- well, I don't -- I 5 can't recall. He's -- right by Leslie. 6 He just stand in front of Annie Kent's a 7 lot after the incident for a while 8 afterward. I don't -- can't say how 9 long. But I know all the time I see him 10 slump down and stand there. And I 11 reported that incident. 12 Q. Was he friends with Annie 13 Kent? 14 A. Well, I don't how -- what 15 their relationship is. 16 Q. Did he ever talk to Annie 17 Kent before February 2005? 18 A. Yes. 19 Q. Go stand at her desk before 20 February of 2005? 21 A. Not that often. 22 Q. How often did he after 23 February of 2005 did he go --</p>	<p style="text-align: right;">Page 107</p> <p>1 Q. Anyone else would have seen 2 him do this? 3 A. Twana, Brenda, Ava Collier; 4 she used to sit across from Annie so. 5 Q. And you said you -- you 6 reported this when? 7 A. Each time reported to 8 Tara. 9 Q. Did you ever speak with 10 Leslie about it, report it to human 11 resources? 12 A. Yes. 13 Q. When? 14 A. An e-mail around the -- I 15 don't recall the date, but I -- I know 16 I -- I sent it to her in e-mail. 17 Q. And did Ms. Liebman talk to 18 you about it? 19 A. No. 20 Q. Did she try to talk to you 21 about it? 22 A. No. 23 Q. So no one from EDS tried to</p>
<p style="text-align: right;">Page 106</p> <p>1 A. I'll -- 2 Q. -- stand at Annie's desk? 3 A. I'll tell you he'll stand 4 anywhere between 10, 15 minutes at a 5 time. 6 Q. But how often every day -- 7 A. -- there, two or three 8 minutes, speak to her and keep going. 9 Q. How often would he do this 10 though? 11 A. After or before? 12 Q. Let's go before. 13 A. Before, probably once a 14 day. 15 Q. And after? 16 A. About four, five times a 17 day. 18 Q. So Ms. Kent could testify 19 that -- 20 A. Yes. 21 Q. -- he would have stood at 22 her desk more after February of 2005? 23 A. Yes.</p>	<p style="text-align: right;">Page 108</p> <p>1 talk to you about it? 2 A. About him coming in the 3 area, no. 4 Q. Did they try to talk to you 5 about any of the allegations you made 6 that he was intimidating you? 7 A. Leslie made the statement 8 that if he comes to me or something let 9 her -- oh, no, no. She didn't say him. 10 She said if anybody else bothers me, let 11 her know. It wasn't that incident. 12 Q. When did she tell you 13 that? 14 A. I don't recall, but it's in 15 e-mail. 16 Q. Was it after the February 17 incident? 18 A. Yes. 19 Q. Before you reported him 20 intimidating you to her? 21 A. I don't recall. 22 23 (Defendants' Exhibit No. 7 was</p>

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<p>1 therapy or something they was telling 2 me. Dr. Barrington's office, she stated 3 she was going to -- I need to file a 4 workman's comp claim on it. I didn't 5 know. I was -- I just paying it. 6 Q. And EDS didn't try to stop 7 you from filing a worker's comp claim, 8 did they? 9 A. Not that I'm aware. 10 Q. In fact you went to your 11 supervisor Tara Relf and she helped you 12 fill out the forms? 13 A. No. She just told me where 14 to go to get it. 15 Q. Okay. Did she have to fill 16 anything out? 17 A. I think she did. I don't 18 know. 19 Q. What happened with that? 20 A. They denied it because they 21 stated that it was on the elevator, 22 something. 23 Q. Okay. Did you appeal the</p>	<p>1 it. I'll give it to my attorney. He'll 2 get it to you. 3 Q. Who all have you seen as a 4 result of what you claim to have 5 happened at EDS? And by seen, I mean 6 doctors or counselors. 7 A. Vonceil Smith, Paul Miller. 8 You said for the incident or just 9 purely -- 10 Q. First as a result of the 11 incident. 12 A. Okay. Dr. Barrington, 13 McKinney, physical therapy at A -- AOS 14 which is Dr. Barrington's office, a 15 chiropractor. I think it's Peavy. 16 Q. What's his name again? 17 A. Dr. Peavy. P-E-A-V-Y. I 18 think that's it. 19 Q. Okay. We've talked about 20 Ms. Smith. She's a psychiatrist? 21 A. Psychiatrist. 22 Q. And you stopped seeing her 23 in November?</p>
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<p>1 denial? 2 A. No. I didn't -- didn't know 3 I could. 4 Q. And do you know who made the 5 decision? 6 A. No. 7 Q. Okay. Is it your 8 understanding that EDS has a third party 9 administrator for its worker's comp? 10 A. No, I didn't. 11 Q. Okay. How did you find out, 12 who told you that your worker's comp had 13 been denied? 14 A. They sent a letter. 15 Q. Who's they? 16 A. Someone out of Georgia from 17 the workman's comp. 18 Q. Okay. It wasn't from EDS? 19 A. I'm not sure. 20 Q. Do you have that 21 documentation? 22 A. I don't know. I may. I 23 don't think I have it on me, but I have</p>	<p>1 A. Yes. 2 Q. And what medication did she 3 give you? 4 A. She actually can't 5 prescribe. Another doctor in there 6 prescribe some -- the cloc -- start with 7 a "C" and Lexapro. He put me on some 8 Zoloft that was too strong. Ambien. 9 Q. Okay. Did you see this 10 other doctor? 11 A. Yes. 12 Q. What was his name? 13 A. I can't recall his name. 14 Q. How often did you see him? 15 A. I think I saw him a total of 16 three times. 17 Q. Were they counseling 18 sessions as well or was it -- 19 A. Yes. 20 Q. -- just -- 21 A. Counseling. 22 Q. Have you seen him since 23 November of '05?</p>

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<p>1 deprived of sleep? 2 A. Oh, yes. 3 Q. For how long? 4 A. Oh, I know it had to been up 5 until -- still off and on now, but 6 constantly like seven, eight months, 7 nine months tops. 8 Q. And you got Ambien? 9 A. Yes. 10 Q. Did you ever take Ambien 11 before this? 12 A. No. 13 Q. Any other thing, the 14 emotional distress, anything that has 15 happened that you claim to be the 16 emotional stress that you suffered? 17 A. No. 18 Q. Just anxiety, panic attacks, 19 paranoia, humiliation, deprived of 20 sleep. You said you're not comfortable 21 in the work environment? 22 A. Right. Shoulder pain. 23 Q. The shoulder pain?</p>	<p>1 And he said he has to schedule an MRI. 2 Q. Have you had an MRI? 3 A. Yes. Two. 4 Q. And? 5 A. And I don't know -- 6 Q. You don't know the 7 results? 8 A. Yeah, I know the results. I 9 don't know the terminology that they 10 used. 11 Q. In layman's terms. 12 A. Layman's terms, something is 13 torn in between that. It was swelling. 14 Q. Had you done anything 15 between February of '05 and when was the 16 MRI? 17 A. The MRI I had November. I 18 had two. I don't recall the dates. But 19 I had -- 20 Q. So November of '05? 21 A. And -- no. January this 22 year, '06, and I think it was one last 23 year.</p>
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<p>1 A. Yes. 2 Q. When did you see a doctor 3 about that? 4 A. Actually, initially saw 5 Rachel McKinney back in February of last 6 year. She sent me to a neurologist. 7 Q. To a neurologist? 8 A. Yes. 9 Q. Okay. 10 A. On -- on the 17th of 11 February of '05. 12 Q. And who was that? 13 A. Paul Miller. 14 Q. And what did he do? 15 A. He did a ECG or E something 16 on that. 17 Q. And what did he find, 18 anything? 19 A. I think he found something. 20 He gave me something. Some 21 anti-inflammatory and he told me to come 22 back in six months. And I came back in 23 six months and pains was still there.</p>	<p>1 Q. Okay. 2 A. X-ray, MRI, one of the 3 two. 4 Q. And it's your contention it 5 happened because of what was on the 6 elevator? 7 A. Because I pulled -- tore 8 cartilage or ligament or something. It 9 was swelling. Said releasing fluids in 10 there. 11 Q. And you hadn't done anything 12 between -- 13 A. No. 14 Q. -- the visits that would 15 cause that? 16 A. No. 17 Q. Okay. And my understanding 18 is you filed a worker's comp claim -- 19 A. Yes. 20 Q. -- about a year after the 21 incident? 22 A. Yes. I didn't know about it 23 when I was going through physical</p>

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